

Jason Crews
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In propria persona

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA
PHOENIX DIVISION

Jason Crews,

Plaintiff,

v.

Tanpri Media & Arts, Inc, *et al.*

Defendants.

Case No.: 2:22-cv-02120-SMB

Memorandum in Support of Plaintiff's Fifth
Ex Parte Application for Subpoenas Duces
Tecum

Pursuant to Federal Rules of Civil Procedure ("FRCP") Rule 45, 69, and General Order 18-19 ("Order"), Judgment Creditor Jason Crews ("Crews") respectfully moves the court to instruct the Clerk of the court to issue subpoenas duces tecum to obtain evidence which he believes to be in the possession of third parties for the purposes of judgment enforcement against Judgment Debtors. In support thereof, Plaintiff states as follows.

On March 27, 2024, this court entered a default judgement in Crews' favor. FRCP Rule 69 states "In aid of the judgment or execution, the judgment creditor or a successor in interest whose interest appears of record may obtain discovery from any person—including the judgment debtor—as provided in these rules or by the procedure of the state where the court is located."

PayPal

PayPal, Inc ("PayPal") maintains an office at 9999 N 90th St, Scottsdale, AZ 85258, <https://maps.app.goo.gl/ee8DWi7zsZRHdBoWA>, which is approximately 20.1 miles away

1 from Crew's address 1515 N Gilbert Rd, Gilbert AZ 8523, and less than 100 miles complaint
2 with rule 45(c)(2)(A).

3 Per a user search on PayPal.com it appears Judgment Debtor, Elizabeth Beauvil
4 ("Beauvil") may have one or more account with PayPal and its subsidiary Venmo. As such,
5 Crews, seeks the following from PayPal:

- 6 1. Please provide the Paypal and Venmo Consumer Profile and Transaction
7 Search for the following email address "customer token" associated email
8 addresses:
9
 - liz@zeroriskcases.com
 - lizb65@gmail.com
 - MEBYRNESN46@YAHOO.COM
- 10 2. To the extent not duplicative of Request No. 1, please provide a list of all
11 PayPal and Venmo transactions associated with the tokens above from
12 December 9, 2022 to present.
- 13 3. To the extent not duplicative of Request No. 1, please provide all bank
14 account and customer information associated with the Paypal and Venmo
15 token account(s) identified, to include, but not limited to, the account holder
16 name, address, SSN, and linked financial institution, bank account number,
17 and routing number.

18 **Bank of America, N.A.**

19 Bank of America, N.A. ("BofA") maintains an office at 1952 S Stapley Dr, Mesa,
20 AZ 85204, <https://maps.app.goo.gl/dcRMhgb7NYbxNi3Q7>, which is approximately 1.3
21 miles away from Crew's address 1515 N Gilbert Rd, Gilbert AZ 85234 and less than 100
22 miles complaint with rule 45(c)(2)(A).

23 Elizabeth Beauvil("Beauvil")

24 Crews seeks the following from BofA.

25 (A) All documents pertaining to any checking accounts, open or closed, held by or
26 under the signatory authority of Defendant Elizabeth Beauvil bearing social security
27 number [redacted] from December 9, 2022 to present;

28 (B) All documents pertaining to any savings accounts, open or closed, held by or
under the signatory authority of Defendant Elizabeth Beauvil bearing social security
number [redacted] from December 9, 2022 to present;

(C) All documents pertaining to any credit card accounts, open or closed, held by or
under the signatory authority of Defendant Elizabeth Beauvil bearing social security
number [redacted] from December 9, 2022 to present;

1 (D)All documents pertaining to any open or closed bank loan documents, reflecting
2 loans made to or co-signed by Defendant Elizabeth Beauvil bearing social security
number [redacted] from December 9, 2022 to present;

3 (E)All documents pertaining to any open or closed investment or security custodian
4 accounts, IRA, Keogh, or other retirement plans in the name of or for the benefit of
5 the Defendant, Elizabeth Beauvil bearing social security number [redacted] from
December 9, 2022 to present;

6 (F)All documents pertaining to Certificates of Deposit purchased or redeemed by the
7 Defendant, Elizabeth Beauvil bearing social security number [redacted] from
December 9, 2022 to present;

8 (G)Customer correspondence files for Defendant Elizabeth Beauvil bearing social
9 security number [redacted] from December 9, 2022 to present.

10 (H)All documents pertaining to cashier's, manager's, or bank checks, traveler's
11 checks, or money orders purchased or negotiated by Defendant Elizabeth Beauvil
bearing social security number [redacted] from December 9, 2022 to present.

12 (I)All documents pertaining to wire transfers sent or received by Defendant,
13 December 9, 2022 bearing social security number [redacted] from December 9, 2022
14 to present, including but not limited to the source of funds being transferred and/or
the destination or recipient of transfer;

15 (J)All records of any and all safe deposit boxes, open or closed, held by or under the
16 signatory authority of Defendant Elizabeth Beauvil bearing social security number
[redacted] from December 9, 2022 to present;

17 (K)Teller tapes reflecting all transactions between the Bank and Defendant Elizabeth
18 Beauvil bearing social security number [redacted] from December 9, 2022 to present;

19 Dated this June 19, 2024.

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21 /s/ Jason Crews

22 Jason Crews
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